

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION

CASE NO.: 1:23-cv-24931-CMA

DAVID'S DOZER V-LOC SYSTEM INC., and
DAVID ARMAS,

Plaintiffs,

v.

DEERE & COMPANY;
JOHN DEERE CONSTRUCTION & FORESTRY
COMPANY; DOBBS EQUIPMENT, LLC; and
EFE, INC. D/B/A EVERGLADES EQUIPMENT GROUP;

Defendants.

JOINT MOTION FOR ENTRY OF STIPULATED PROTECTIVE ORDER

Plaintiffs David's Dozer V-Loc System Inc. and David Armas (collectively "Plaintiffs") and Defendants Deere & Company, John Deere Construction & Forestry Company, Dobbs Equipment, LLC, and EFE, Inc. (collectively "Defendants") (Plaintiffs and Defendants collectively, the "Parties"), by and through their undersigned counsel and pursuant to Fed. R. Civ. P. 26(c) and S.D. Fla. L.R. 7.1, hereby submit this Joint Motion for entry of the attached Stipulated Protective Order, and in support thereof state as follows:

The Parties have stipulated that good cause exists for entry of a protective order to prevent unauthorized disclosure and use of the Parties' proprietary and confidential information during and after the course of this litigation.

WHEREFORE, the Parties respectfully request that the Court enter the attached Stipulated Protective Order.

Dated: May 14, 2024

/s/ Rafael Perez-Pineiro

Richard Guerra (Fla. Bar No. 689521)

Email: rguerra@brickellip.com

Arthur Robert Weaver (Fla. Bar No. 92132)

Email: rweaver@brickellip.com

Javier Sobrado (Fla. Bar No. 44992)

Email: jsobrado@brickellip.com

Rafael Perez-Pineiro (Fla. Bar No. 543101)

Email: rperez@brickellip.com

THE BRICKELL IP GROUP, PLLC

1101 Brickell Avenue, South Tower, Suite 800

Miami FL, 33131

Telephone: (305) 728-8831

Attorneys for Plaintiffs

Respectfully submitted,

/s/ Jorge Espinosa

Jorge Espinosa (Fla. Bar No. 779032)

Email: Jorge.Espinosa@gray-robinson.com

Francesca Russo (Fla. Bar No. 174912)

Email: Francesca.russo@gray-robinson.com

GRAY|ROBINSON, P.A.

333 S.E. 2nd Avenue, Suite 3200

Miami, FL 33131

Telephone: (305) 416-6880

Facsimile: (305) 416-6887

Attorneys for Defendants